

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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RHONDA HALL,

Plaintiff,

V.

VERIZON COMMUNICATIONS, INC.,  
and VERIZON NEW ENGLAND, INC.

Defendants.

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Civil Action No. 3:05-cv-30002-MAP

MOTION OF PLAINTIFF RHONDA HALL  
FOR AN EXTENSION OF TIME TO FILE OPPOSITION TO  
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

The Plaintiff respectfully moves this Court for an extension of time until Wednesday, October 18, 2006 to file her opposition to the Defendant's pending motion for summary judgment, and to correspondingly extend the time for the filing of a reply by the Defendants until October 25, 2006. As grounds for this motion, Plaintiff states:

1. The Defendant has filed a motion for summary judgment on the Plaintiff's claims raised in her complaint.
2. The Plaintiff's opposition to the Defendant's motion for summary judgment is presently due on October 10, 2006.

3. Since being served with Defendants' Motion for Summary Judgment, an intervening vacation and particularly pressing scheduling demands have interfered with Plaintiff's counsel's ability to complete the Plaintiff's opposition without the requested extension.

4. Immediately after being served with the Defendants' motion for summary judgment, Plaintiff's counsel was out of the country on vacation with his family for two weeks.

5. Since returning from vacation on September 5, 2006, Plaintiff's counsel has experienced particularly heavy scheduling demands, including preparation for two previously scheduled trials and three back-to-back mediations.

6. Plaintiff's counsel has temporarily assumed responsibility for cases transferred from two other attorneys which has dramatically increased the scheduling demands placed on Plaintiff's counsel. The firm of Heisler, Feldman, McCormick & Garrow, P.C. has four attorneys and a two-year Access to Justice Fellowship for a recent law school graduate. Attorney Joel Feldman is currently on a six-month leave of absence from the firm, and attorney Sarah Lazare concluded her two year Access to Justice Fellowship on September 11, 2006. The remaining three attorneys have taken on responsibility for the active cases of attorneys Lazare and Feldman.

For the reasons set forth above, the Plaintiff respectfully requests an extension of time until Wednesday, October 18, 2006 to file her opposition to the

Defendant's pending motion for summary judgment, and to correspondingly extend the time for the filing of a reply by the Defendants until October 25, 2006

Respectfully submitted,

PLAINTIFF RHONDA HALL  
By her Attorney,

Dated: October 10, 2006

/s/ Hugh D. Heisler  
Hugh D. Heisler, Esq.  
BBO # 563925  
Heisler, Feldman, McCormick &  
Garrow, P.C.  
1145 Main Street, Suite 508  
Springfield, MA 01103  
(413) 788-7988

#### CERTIFICATE OF SERVICE

I, Hugh D. Heisler, hereby certify that true copies of the foregoing Motion were electronically served upon the attorney of record for the Defendants on October 10, 2006.

/s/ Hugh D. Heisler  
Hugh D. Heisler